"Maceton," Francisco Servin-Soto, aka "Pancho," Jessica Guzman-Soto, Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny," and Melinda Lee Vanetten did knowingly and intentionally aid and abet each other in the possession with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance. The defendants knowing and intending that the quantity of heroin would be distributed in Hawaii.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

## COUNT 37

The Grand Jury further charges that:

On or about March 31, 2000, in the District of Hawaii, defendants LUIS ARIAS, aka "Whiskey," aka "Lino," aka "Luis Manuel Arias-Astorga," JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," and Francisco Servin-Soto, aka "Pancho," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

The Grand Jury further charges that:

On or about March 31, 2000, in the District of Hawaii, defendants JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," and SAMMY BENNET used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 39

The Grand Jury further charges that:

On or about March 31, 2000, in the District of Hawaii, defendants ROBERT LNU and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

The Grand Jury further charges that:

On or about April 1, 2000, in the District of Hawaii, defendants ROBERT LNU and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 41

The Grand Jury further charges that:

On or about April 1, 2000, in the District of Hawaii, defendants ROBERT LNU and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

The Grand Jury further charges that:

On or about April 1, 2000, in the District of Hawaii, defendants ROBERT LNU and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 43

The Grand Jury further charges that:

On or about April 1, 2000, in the District of Hawaii, Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 44

The Grand Jury further charges that:

On or about April 1, 2000, in the District of Hawaii, Warren LNU and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section  $843\,(b)$ .

### COUNT 45

The Grand Jury further charges that:

On or about April 1, 2000, in the District of Hawaii, defendants SAMMY BENNET and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 46

The Grand Jury further charges that:

On or about April 1, 2000, in the District of Hawaii, Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 47

The Grand Jury further charges that:

On or about April 1, 2000, in the District of Hawaii, Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II

controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

#### COUNT 48

The Grand Jury further charges that:

On or about April 2, 2000, in the District of Hawaii, Warren LNU and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 49

The Grand Jury further charges that:

On or about April 2, 2000, in the District of Hawaii,
Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny,"
and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton,"
used and caused to be used a communications facility, that is, a
telephone, in causing or facilitating the commission of a
conspiracy to distribute and possess with intent to distribute a
quantity of heroin in excess of 100 grams, a Schedule I

controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

# COUNT 50

The Grand Jury further charges that:

On or about April 2, 2000, in the District of Hawaii, defendants LUIS ARIAS, aka "Whiskey," aka "Lino," aka "Luis Manuel Arias-Astorga," and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

# COUNT 51

The Grand Jury further charges that:

On or about April 2, 2000, in the District of Hawaii, defendants SAMMY BENNET and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent

to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 52

The Grand Jury further charges that:

On or about April 2, 2000, in the District of Hawaii, Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 53

The Grand Jury further charges that:

On or about April 2, 2000, in the District of Hawaii, defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," and Zasha Botelho used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the

commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 54

The Grand Jury further charges that:

On or about April 2, 2000, in the District of Hawaii, Warren LNU and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 55

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii,

Refugio Estrella Rodriguez, aka "Old Man," and defendant JORGE

SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing

or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 56

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, defendants CHRIS DAMPF and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 57

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii,
Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny,"
and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton,"
used and caused to be used a communications facility, that is, a

telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

### COUNT 58

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, defendants ROBERT LNU and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

#### COUNT 59

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, defendants LUIS ARIAS, aka "Whiskey," aka "Lino," aka "Luis Manuel Arias-Astorga," JORGE SALAZAR-GUILLEN, aka "Juan," aka

"Maceton," and Francisco Servin-Soto, aka "Pancho," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 60

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, Refugio Estrella Rodriguez, aka "Old Man," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, Francisco Servin-Soto, aka "Pancho," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

#### COUNT 62

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, defendants HEBERT LNU and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

#### COUNT 64

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, Warren LNU and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

The Grand Jury further charges that:

On or about April 3, 2000, in the District of Hawaii, defendants HEBERT LNU and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

#### COUNT 66

The Grand Jury further charges that:

On or about April 4, 2000, in the District of Hawaii, Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 67

The Grand Jury further charges that:

On or about April 5, 2000, in the District of Hawaii, defendants LUIS ARIAS, aka "Whiskey," aka "Lino," aka "Luis Manuel Arias-Astorga," and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 68

The Grand Jury further charges that:

On or about April 6, 2000, in the District of Hawaii, defendants ROBERT LNU and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a

Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 69

The Grand Jury further charges that:

On or about April 6, 2000, in the District of Hawaii, defendants LUIS ARIAS, aka "Whiskey," aka "Lino," aka "Luis Manuel Arias-Astorga," and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 70

The Grand Jury further charges that:

On or about April 7, 2000, in the District of Hawaii, defendants LUIS ARIAS, aka "Whiskey," aka "Lino," aka "Luis Manuel Arias-Astorga," and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to

distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 71

The Grand Jury further charges that:

On or about April 8, 2000, in the District of Hawaii, Refugio Estrella Rodriguez, aka "Old Man," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

#### COUNT 72

The Grand Jury further charges that:

On or about April 8, 2000, in the District of Hawaii, defendants SAMMY BENNET and JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent

to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 73

The Grand Jury further charges that:

On or about April 8, 2000, in the District of Hawaii, Pablo Romero, aka "Pablo Gilberto Romero-Flores," aka "Sonny," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute and possess with intent to distribute a quantity of heroin in excess of 100 grams, a Schedule I controlled substance, and a quantity of cocaine, a Schedule II controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

## COUNT 74

The Grand Jury further charges that:

On or about April 8, 2000, in the District of Hawaii, Refugio Estrella Rodriguez, aka "Old Man," and defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," did knowingly and intentionally aid and abet each other in the possession with

intent to distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

## COUNT 75

The Grand Jury further charges that:

On or about April 8, 2000, in the District of Hawaii, defendant TROY WILLIAM FAUVER and Virgil Edward Slot did knowingly and intentionally aid and abet each other in the possession with intent to distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

## COUNT 76

The Grand Jury further charges that:

On or about April 8, 2000, in the District of Hawaii, defendant TROY WILLIAM FAUVER did knowingly and intentionally possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

## COUNT 77

The Grand Jury further charges that:

On or about April 8, 2000, in the District of Hawaii, defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," being an unlawful user of and addicted to a controlled substance, to

wit, cocaine, did knowingly possess in and affecting commerce a firearm, that is, a Colt .38 special revolver, serial number 631010.

All in violation of Title 18, United States Code, Section 922(g)(3).

# COUNT 78

The Grand Jury further charges that:

On or about April 8, 2000, in the District of Hawaii, defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," being an unlawful user of and addicted to a controlled substance, to wit, cocaine, did knowingly possess in and affecting commerce, a firearm, that is, a Harrington and Richardson .22 revolver, serial number AE94905.

All in violation of Title 21, United States Code, Section 844(a).

#### COUNT 79

The Grand Jury further charges that:

From a date unknown, but from at least April 1, 1999, and continuing to on or about August 1, 2000, in the District of Hawaii and elsewhere, the defendants JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," ALMA OLVERA and EMILIO OLVERA, did unlawfully, willfully and knowingly conspire, with each other and others known and unknown to the grand jury, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, to conduct and attempt to conduct such transactions affecting interstate

commerce, which involved the proceeds of a specified unlawful activity, that is, distribution of controlled substances, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the specified unlawful activity. All in violation of Title 18, United States Code, Section 1956(a)(1).

# OVERT ACTS

In furtherance of and in order to accomplish the objects of this conspiracy, the defendants performed overt acts in the District of Hawaii and elsewhere, including but not limited to the following:

- 1. On or about April 15, 1999, the defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," obtained Travelers Express and Western Union Money Orders in the District of Hawaii.
- 2. On or about April 22, 1999, defendant ALMA OLVERA and EMILIO OLVERA opened a joint savings account at Bank One in Porter, Texas.
- 3. On or about late April 1999, the defendant JORGE SALAZAR-GUILLEN, aka "Juan," aka "Maceton," transferred a quantity of Travelers Express and Western Union Money Orders to ALMA OLVERA and EMILIO OLVERA.
- 4. On or about May 24, 1999, defendant ALMA OLVERA deposited \$2,500 in Travelers Express and Western Union Money Orders into her joint account at Bank One.

- 5. On or about June 2, 1999, defendant ALMA OLVERA withdrew \$9,846.82 in U.S. currency from her joint account at Bank One.
- 6. On or about June 7, 1999, defendant EMILIO OLVERA withdrew \$11,144.13 from his joint account at Bank One.
- 7. On or about September 2, 1999, defendant ALMA OLVERA purchased a cashiers check in the amount of \$5,308.93 at Bank One.
- 8. On or about September 11, 1999, defendant ALMA OLVERA purchased a cashiers check in the amount of \$600 at Bank One.

Assistant U/S. Attorney

	DATED:	OCT 25,	2000	A TRUE BI	Ionolulu, LL	Hawaii.
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Su	STEVEN S. ALM			·		
<u> </u>	United States Attorr District of Hawaii	ney				
	ELLIOT ENOKI First Assistant U.S	. Attorney				
	T. Muchle	<u>e</u>				
	THOMAS MUEHLECK Assistant U.S. Atto	rney				
	LORETTA SHEEHAN Assistant U.S. Atto	rney				
	BRVERLY WEE SAMESHI	) 	-			

United States v. Jorge Salazar-Guillen, et al. Cr. No. 00-00187 HG Second Superseding Indictment